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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**DATE:** October 30, 1998

**SUBJECT:** Health and Safety Plan Review for the Fansteel North Chicago Site Investigation

**FROM:** Alan K. Baumann, Health and Safety Manager  
Superfund Division

**TO:** John O'Grady, RPM

I have reviewed the revised Health and Safety Plan (HASP), prepared by Carlson Environmental, Inc., for the above site and have the following comments:

- ☞ As stated in my first review, any subcontractors working on site must develop their own HASP in accordance with 29 CFR §1910.120 Appendix C, structured so that it will smoothly interface with the program of the principle contractor. Usually, this is written in the form of an addendum, covering the specific activities the subcontractor will be doing, and appended to the site HASP. This HASP anticipates subcontractors for geoprobe work, any confined space work, or overpacking drums.
- ☞ Hearing protection is not listed in the PPE list to be used.
- ☞ Because lead and cadmium are listed as possible site contaminants, the OSHA expanded standards given in 29 CFR §1910.1025 for lead and 29 CFR §1910.1027 for cadmium should be referenced in the HASP. There are specific medical monitoring requirements in these regulations that must also be followed.
- ☞ The heat stress monitoring section has been revised to require employees to monitor themselves. During warmer conditions, there should be employer controls or oversight of this activity to ensure it is being done.
- ☞ I'm still not impressed with the job hazard analysis section. It has bits and pieces of what is required, but is not activity specific. Under Physical Hazards, it lists chemicals. There is no mention of biological hazards.

The above recommendations should be considered by the contractor. This HASP, along with your training on EPA safety procedures, should be sufficient to allow you safe access to the site for overview activities. If additional EPA activities are anticipated such as geoprobing, well installation or sampling, please let me know in advance.

Please feel free to contact me if you have any questions regarding my comments. Also, please complete the attached critique sheet and return it to Steve Ostrodka at SMF-4J.

